

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

PROSPECT MEDICAL HOLDINGS, INC., *et al.*,¹
Debtors.

Chapter 11

Case No. 25-80002 (SGJ)

(Jointly Administered)
Rel. to Dkt. No. [●]

**ORDER (I) APPROVING THE CLOSURE OF THE
PENNSYLVANIA HOSPITALS; AND (II) GRANTING RELATED RELIEF**

Upon the motion (“Motion”)² of Prospect Medical Holdings, Inc. and its debtor affiliates, as debtors and debtors in possession (collectively, the “Debtors”), for entry of an order (this “Order”) (i) approving the Closure of the Pennsylvania Hospitals; and (ii) granting related relief, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Order of Reference of Bankruptcy Cases and*

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://omniagentsolutions.com/Prospect>. The Debtors’ mailing address is 3824 Hughes Ave., Culver City, CA 90232.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

Proceedings Nunc Pro Tunc dated August 3, 1984, entered by the United States District Court for the Northern District of Texas; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and due and sufficient notice of the Motion having been given under the particular circumstances; and it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and after due deliberation thereon; and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The relief requested in this Motion is GRANTED on a final basis as set forth herein.
2. The Debtors are authorized to close the Pennsylvania Hospitals set forth on **Schedule 1** annexed to this Order in accordance with the Closure Plan set forth in the Motion. The Debtors are authorized to make amendments to such Closure Plan in consultation with the applicable regulators without further order from this Court.
3. Local, state, and federal regulators shall cooperate with the Debtors in good faith to effectuate the closure of the Pennsylvania Hospitals, and the Debtors shall have no liability to any governmental entity for effectuating the closure of the Pennsylvania Hospitals in accordance with the proposed Closure Plan approved by this Order.
4. The Debtors reserve the right to (i) reject contracts or leases pursuant to the *Order (I) Authorizing Rejection of Certain Executory Contracts and Unexpired Leases of Nonresidential Real Property, (II) Approving Procedures for Future Rejection of Additional Executory Contracts and Unexpired Leases, and (III) Granting Related Relief* [Docket No. 605] or a separate motion

approved by the Court, or (ii) sell or abandon assets pursuant to any order entered in connection with the *Debtors' Motion for Entry of an Order Approving Procedures for the Sale, Transfer, and/or Abandonment of De Minimis Assets* [Docket No. 818] or a separate motion approved by the Court.

5. Pursuant to section 554(a) of the Bankruptcy Code, the Debtors are authorized, but not directed, in their sole discretion, to abandon the Abandoned Assets located at the applicable leased premises free and clear of any interests of any party, subject to proper notice of such abandonment being given; *provided*, that if the Debtors are abandoning assets which may contain personal or confidential information about the Debtors' employees or patients (the "Confidential Information"), the Debtors shall remove the Confidential Information from such assets before such abandonment, and retain such Confidential Information until further order of the Court. Any landlord or other designee shall be free, notwithstanding the automatic stay, to dispose of Abandoned Assets without notice or liability to any party and without further notice or order of the Court. Any personal property of the Debtors remaining at the leased premises after the Proposed Closure Date shall be deemed abandoned as of the Proposed Closure Date, free and clear of all liens, claims, interests, or other encumbrances.

6. The Debtors may not abandon any medical waste, pharmaceuticals, toxic or hazardous (as such term is defined in any federal, state or local law, rule, regulation or ordinance) material, if any, at the leased premises, and must remove all such materials from the leased premises designated for rejection prior to the closure of the applicable Pennsylvania Hospital.

7. Nothing contained in the Motion or this Order, nor any payment made pursuant to the authority granted by this Order, is intended to be or shall be deemed as (a) an admission as to the validity of any claim against the Debtors; (b) a waiver of the Debtors' or any party in interest's

rights to dispute the amount of, basis for, or validity of any claim or interest under applicable law or nonbankruptcy law; (c) a promise or requirement to pay any claim; (d) a waiver of the Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law; (e) a request for or granting of approval for assumption of any agreement, contract, program, policy, or lease under section 365 of the Bankruptcy Code; or (f) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates. Likewise, if the Court grants the relief sought herein, any payment made pursuant to the Court's order is not intended to be and should not be construed as an admission to the validity of any claim or a waiver of the Debtors' or any party in interest's rights to subsequently dispute such claim.

8. Notice of the Motion is adequate under Bankruptcy Rule 6004(a) and the Local Bankruptcy Rules. Emergency relief of the Motion is warranted.

9. Notwithstanding the provisions of Bankruptcy Rule 6004(h), this Order shall be immediately effective and enforceable upon its entry.

10. The Debtors are authorized to take all actions necessary or appropriate to carry out the relief granted in this Order.

11. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

END OF ORDER

Order submitted by:

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*Attorneys to the Debtors
and Debtors in Possession*

Schedule 1

Proposed Hospital Closures

	Hospital	City	State	Address
1.	Crozer-Chester Medical Center	Chester	PA	1 Medical Center Blvd, Upland, PA 19013
2.	Springfield Hospital	Springfield	PA	190 W. Sproul Road, Springfield, PA 19064
3.	Taylor Hospital	Ridley Park	PA	175 E. Chester Pike, Ridley Park, PA 19078
4.	Delaware County Memorial Hospital	Drexel Hill	PA	501 N. Lansdowne Ave, Drexel Hill, PA 19026
5.	Other Facilities	-	PA	<p><u>Community Campus</u> 301 W. 15th St, Chester, PA 19013</p> <p><u>Crozer Medical Plaza at Brinton Lake</u> 300 Evergreen Drive, Glen Mills, PA 19342</p> <p><u>Crozer Health at Broomall</u> 30 Lawrence Road, Broomall, PA 19008</p> <p><u>Media Medical Plaza</u> 200 E. State Street, Media, PA 19063</p> <p><u>Surgery Center at Haverford</u> 2010 West Chester Pike MOB Wellness Center II, Suite 212</p>